

Exhibit A

1 I'm sorry. There's multiple questions there.

2 Let start with, when did you become Detective?

3 A From when I was at the drain, I was Detective Trooper.
4 Prior to that, I was Violent Crimes Task Force and
5 Surveillance. Basically, from 2006 until 2011, I was
6 Detective Trooper. There is a certain interview
7 process you have to go through, through question and
8 answer form. In 2013, I became a Detective Sergeant up
9 for a promotion in to our Detective Bureau. Same type
10 of scenarios, same type of question and answer type of
11 interview.

12 Q All right. And were you interviewed for that position
13 in 2013?

14 A Correct.

15 Q Okay. Do you know who assigned you to be in charge of
16 this investigation on this case, on Mr. Terrance
17 Kellom?

18 A I believe, it was Lieutenant Tiseo at that time, if he
19 was still there. They have had --

20 Q Lieutenant Tiseo?

21 A T-i-s-e-o

22 Q He is based out of where?

23 A I don't believe, he works for Detroit Police Department
24 anymore. I believe, he retired the last year. I'm not
25 sure where he works, but at that time --

1 Q At that time, he worked for whom?

2 A DPD, he was Lieutenant, Homicide Task Force.

3 Q So, the DPD, the Homicide Task Force -- the Homicide
4 Task Force assigned you, basically, to investigate?

5 A Correct.

6 Q Okay.

7 A If that helps. If that helps, like, we have a General
8 Assignment List and my name was up on that list ready
9 to go.

10 Q Does he still work there now or not?

11 A He does not work in the task force. When he left
12 there, anyway, he went to the Ninth Precinct, but I
13 believe, he retired last year. I'm not real sure.

14 Q Do you remember, sir, what he told you, if anything, as
15 to taking on this case?

16 A No. Just that "You're up," type of thing on the list,
17 so --

18 Q You say, a list. List. What list are you talking
19 about?

20 A We have a General Assignment List. So, like, the
21 homicides that we have, and we have the officer
22 involved shootings, then on the MSP side, we take Wayne
23 County and custody desk as well as officer involved
24 shootings. So, there are different lists we go off of.

25 Q That includes the homicides by nonofficers as well?

1 A Yes. So, there's three separate lists, General
2 Assignments which are homicides.

3 Q Okay.

4 A Then you have Wayne County in custody desk, where all
5 the MSP will handle those.

6 Q Okay.

7 A And then below that, we have officer involved shootings
8 from the DP side and the NSP side. Sorry. If it's a
9 DPD involved in the shooting, the DPD Detective next
10 will handle that if there is -- an outside agency will
11 handle that if there is an outside shooting.

12 Does that make sense?

13 Q So, you were tasked by Lt. Tiseo to basically handle
14 that?

15 A Correct.

16 Q Okay.

17 (Brief break taken.)

18 Q Det. Sanchez, you indicated that there is some sort of
19 checks and balances that your higher-ups do.

20 Can you talk about that?

21 What are the checks and balances that you are
22 talking about?

23 MR. HELMS: I object to form.

24 THE WITNESS: We were talking about the
25 transparency part of the investigation we have to go

1 through. So, every morning, we have, like, a 9:30
2 briefing. We go over the investigation. I have a list
3 that I believe, needs to be followed up on. They
4 oversee what has to be done on the case as well. If
5 it's getting off the list or if they have different
6 ideas that are going to be pertinent to the
7 investigation.

8 BY MR. AYAD:

9 Q Who is part of that -- privy?

10 A Everybody. So, at that time, I think, we had probably
11 about 18 people on the task force as well as the
12 supervisors.

13 Q Okay.

14 A So, we have a briefing where everybody sits down and we
15 go over investigation, what hasn't been done and what
16 is getting done and then it is overseen by the
17 supervisors.

18 Q But let's go back to the checks and balances.

19 What is it that you feel that -- so that you
20 said that you should be part of this investigation?

21 A So, you have DPD that's there. You have Michigan State
22 Police. The two supervisors, they review what's going
23 on at that time. I believe, at the DA -- where the DA
24 partner would -- also reviewed what's being done on
25 that.

1 Q And you are talking about right before April 22, 2015,
2 that's who was there in reference to?

3 A I want to say, it was just the DA was there at the
4 time. I don't believe, the FBI came over until the
5 following year.

6 Q All right. And yes, I'm trying to find out,
7 Det. Sanchez, as to who made the decision to basically
8 put you as in charge of this investigation.

9 MR. HELMS: I object to form.

10 THE WITNESS: It just goes basically off a
11 list. So, my name was next on the list, all right?
12 So, break it down one more time. So, whoever
13 has the new investigation at that time. DPD had a lot
14 of investigations on homicides when they brought them
15 over from their original squad.

16 BY MR. AYAD:

17 Q Okay.

18 A So, all the State Police Troopers were getting the
19 assignments. The general assignment, first, then we go
20 below the DPD. So, as the supervisors, I would have
21 been one of the Detective Sergeants at that time. We
22 had one other prior Detective Sergeant from the State
23 Police. It went me and him, then the Troopers would be
24 the next ones in line for those outside the agents with
25 DPD. It just depends who was up next, how they wrote

1 those down for those officer involved shootings. So,
2 name was number one on the list to be the next one that
3 actually comes in at that time.

4 Q How is that list conducted?

5 I mean, you say --

6 A It would have been through probably Lt. Tiseo and my
7 Lieutenant at that time was Lieutenant Weimer.

8 Q How often was it changed?

9 A If I take one, I go to the bottom of the list. So,
10 whoever is next up on the list.

11 Q When was the last time you took one before April 22,
12 2015?

13 A I have -- part of the problem being part of MSP, last
14 one was down in Livonia about the shooting down in
15 Plymouth.

16 Q When was that?

17 A I want to say, in the summer sometime.

18 Q 2015?

19 A No. This was back --

20 You are asking me the last one I took?

21 Q No. I'm saying, before April 27, 2015.

22 A As an OSD, I wouldn't have been OSD. I would have just
23 been contributing partner on the team at that time.

24 Q I'm trying to find out, how did you get to the top of
25 the list?

1 You said, it's by the list.

2 A That's how it started at that time in June of
3 2014. I believe, that's when it originated was --
4 that's when -- why I started saying that we will get
5 involved with the shootings that are outside of any
6 outside agent involved in this shooting, outside the
7 city of Detroit. At that time, I don't believe, we had
8 -- I think, that was the first one that we had was
9 that.

10 Q In fact, there was a first one, wasn't it?

11 A Outside departments with -- since the task force, I
12 believe that was the first one outside agency. That's
13 why I say, my name was at the top of the list, because
14 that was going to be my assignment.

15 Q Okay. It's not like you had others and you just
16 circled around and had this new one, right?

17 This was the first one?

18 A No. This was the actual first one as MSP involved as
19 OIC.

20 Q All right. We talked, Det. Sanchez, about everything
21 that you did to investigate the death of
22 Terrance Kellom. This was your duty, right?

23 Basically, to investigate everything about this
24 shooting, see what the circumstances were and come to a
25 possible conclusion, right?